

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

SHERITTA LAMBERT,

Plaintiff,

v.

FIRST ADVANTAGE BACKGROUND  
SERVICES CORP.,

Defendant.

Case No.

REMOVED FROM THE CIRCUIT COURT  
OF CLINTON COUNTY, MISSOURI

**DEFENDANT'S NOTICE OF REMOVAL**

Defendant FIRST ADVANTAGE BACKGROUND SERVICES CORP., by its attorneys and pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, hereby files this Notice of Removal of Case No. 19CN-CC00009 pending in the Circuit Court of Clinton County, Missouri. In support of its Notice of Removal, First Advantage states as follows:

1. On February 19, 2019, Plaintiff Sheritta Lambert commenced this action by filing a Petition in the Circuit Court of Clinton County, Missouri, captioned *Sheritta Lambert v. First Advantage Background Services Corp.*, Case No. 19CN-CC00009.
2. In her Petition, Plaintiff alleges that First Advantage violated the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* ("FCRA").
3. First Advantage was served with Summons and a copy of the Petition on February 21, 2019.
4. The Notice of Removal is timely pursuant to 28 U.S.C. § 1446(b) because the notice has been filed within thirty days of service of the Petition upon First Advantage.

5. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Plaintiff's FCRA claim arises from the Constitution, laws, or treaties of the United States. Accordingly, this action is removable to this Court pursuant to 28 U.S.C. § 1441(a).

6. The Circuit Court of Clinton County, Missouri is located within the Western District of Missouri; therefore, venue is proper in this Court under 28 U.S.C. § 1441(a).

7. Written notice of the filing of this Notice of Removal is being delivered to Plaintiff through her counsel of record. A copy of the Notice of Removal also will be filed with the Clerk of the Circuit Court of Clinton County, Missouri.

8. True and accurate copies of the Summons, Petition, and all other process, pleadings, and orders served on First Advantage in the state court action are attached hereto as Exhibit 1.

9. The undersigned has read this Notice of Removal, and to the best of the undersigned's knowledge, information, and belief, formed after reasonable inquiry, certifies that First Advantage's factual allegations have evidentiary support, and its legal contentions are warranted by existing law. The undersigned also certifies that this Notice of Removal is not interposed for any improper purpose, such as to harass, cause unnecessary delay, or needless increase in the cost of litigation.

Respectfully submitted,

FIRST ADVANTAGE BACKGROUND  
SERVICES CORP.

By /s/ Rosalee M. McNamara

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Attorneys for Defendant

\*to be admitted *pro hac vice*

Date: March 22, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on March 22, 2019, I electronically filed DEFENDANT'S NOTICE OF REMOVAL with the Clerk of the Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

Charles Jason Brown  
Jayson A. Watkins  
Brown & Watkins LLC  
301 S. US 169 Hwy  
Gower, Missouri 64454

*/s/ Rosalee M. McNamara*

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Attorney for Defendant